

	Construction Environmental Management Plan – River Works				No.: 679-TSL-ESG-CEMP
					Rev.: 01
					Date: 09/04/26
Document Type: Site Plan	Project: Whitehorse	Client: Cereal Partners UK	Contractor: TSL	Doc Owner: TSL Sustainability Lead	

Construction Environmental Management Plan – River Works

Project: Project Whitehorse

Client: Cereal Partners UK

Document Reference: 679-TSL-ESG-CEMP-River Works

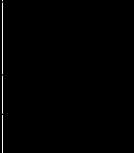
Location: Cereal Partners, Staverton, Trowbridge BA14 6PG

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Revision History:

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01	03/03/26	First revision for review			04/03/26

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This report was prepared by TSL within the terms of its engagement and in direct response to a scope of services.

The report does not consider any changes in information that may have occurred since its publication. If the information relied upon is subsequently determined to be false, inaccurate, or incomplete, then the observations and conclusions expressed in the report may have changed.

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1.0 Introduction

1.1 Scope

The works comprise the delivery by TSL of the River Wall works at Cereal Partners UK's Staverton site. This Construction Environmental Management Plan (CEMP) applies to all construction activities undertaken as part of the River Wall defence works.

This CEMP pertains only to the **River Wall Defence** (flood defence/flood resilience works) works, for the demolition and construction please see 679-TSL-ESG-CEMP.

TSL and Cereal Partners UK recognise the importance of effective environmental management to ensure the responsible delivery of the works in accordance with company objectives, contractual commitments and all relevant legal and regulatory requirements.

1.2 Plan Purpose

This Construction Environment Management Plan (CEMP) provides details as to how environmental management must be conducted through the project specific controls and instructions as set out within the entirety of this document.

The purpose of the CEMP is:

- To put into practice our commitment to environmental performance and achieve the requirement of our EMS documentation
- To comply with the relevant legal and contract requirements and requirements of TSL Environmental Management System (EMS)
- To assess opportunities where the works can result in a positive net gain on an existing environmental site condition
- To avoid, minimise and control environmental impacts of all project activities by adopting working practices that will achieve good environmental practices on site
- To ensure that our workforce, subcontractors, and suppliers are aware of the environmental constraints and opportunities of the project
- To identify the responsibilities of staff and contractors in achieving good environmental practice and foster a sense of environmental responsibility for the personnel at all levels
- To undertake measures to eliminate or reduce pollution, minimise waste and conserve resources

This will be achieved by:

- Open environmental liaison with all interested parties including regulatory bodies, interested stakeholders and the general public
- Providing relevant environmental training and testing of competency to promote high standards of personal awareness of risk and hazards, and the knowledge of personal responsibilities both to themselves, the general public and all aspects of the environment
- A robust system of controls set to best practice guidelines within the TSL Environmental Standards
- Site compliance with the CEMP and work instructions detailed within; this will ensure that environmental management is addressed and rigorously incorporated in all decision-making
- A regular environmental audit and inspection agenda to monitor compliance with the statutory requirements and contractual obligations thus enabling swift rectification of any non-compliance.
- Operating a system for recording, responding, and reporting all environmental incidents arising from the works

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All standard systems, procedures, and controls referred to in this plan are described in detail in the TSL Environmental Management System. Records generated on site will be maintained in accordance with the TSL procedures; this approach ensures that the complete documented environmental records are kept for accessible reference.

The CEMP will be completed by the responsible Sustainability Lead and reviewed by the Group Director, Compliance & Sustainability (or appointed person/s). The CEMP shall be reviewed regularly during the terms of the project, not exceeding a period longer than 12 months. The CEMP must be retained on site (in hard copy or / and in an accessible electronic format) and on the TSL storage server.

1.3 Environment Minimum Requirements

Project delivery shall be in accordance with the generic environmental compliance requirements as detailed in the Construction Environmental Minimum Requirements (EMR). This document is to be read in combination with the project specific controls and assessment as defined in this Construction Environmental Management Plan (CEMP). Note that (if applicable) controls in the CEMP supersede that of any similar instructions in the EMS.

1.4 Policy and legal requirements

1.4.1 Policy

The Operations Team will ensure that the TSL-POL-003 Environment Policy Statement is posted on site noticeboards and that project delivery is aligned with the defined standards.

1.4.2 Compliance

This CEMP has been produced in accordance with the TSL Environment Compliance Checklist and the TSL Environment Legal Register. The registers are updated at regular intervals by the Group Director, Compliance & Sustainability who will issue briefings on changes to the register and any new legislation which will affect activities.

1.4.3 Third Party Requirements / Agreements

Where any third-party permissions, consents, assents, permits, or licenses are agreed this will be outlined in section 5.0 of this report. TSL will retain copies and a register of all the aforementioned in a centralised location on the server.

1.5 Monitoring and Inspection

1.5.1 Project Checks and Inspections

- Environmental inspections will be completed by the assigned Sustainability Lead at a frequency based on the level of risk for each project, as determined by the risk calculation in the CEMP. Dependent on the program and time of construction, these frequencies will change to suit the risk calculation
- Environmental inspection reports will be sent to the structure identified in the CEMP. Corrective actions will be the responsibility of the Line Manager to ensure they are completed in the timescale required
- The frequency of inspections may be amended in accordance with the siteworks and environmental sensitivity. After an environmental incident, the inspection frequency may be increased. As the construction phase of the contract draws to a close, inspection frequency may decrease
- An operation team site check will be completed by a nominated individual at a frequency set by the Sustainability Lead. These inspection reports will be maintained on site.

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1.5.2 Contingency

Any identified breach of Environmental Law shall trigger reactive environmental actions proportionate to the failures identified, for example, stopping work and reviewing performance immediately. An incident is classified as “an undesired event that results in” or “slightly different circumstances that could result in, harm to people, damage to property, damage to the environment or loss of process.”

All site personnel shall inform the Site Manager and Project Manager if an environmental incident occurs, who will in turn report incidents and non-conformances as detailed by the standard operating procedure Management of Incidents & Management of Emergency Events. The specific Incident & Event Escalation Chart must be followed for environmental escalations. Near Miss events are recorded within InnDexx, reported weekly within the status reports to the client and mitigation measures implemented.

Upon review of any incident environmental Gap analysis shall be carried out to identify improvements to the CEMP and the delivery of the works; any additions / changes shall be incorporated into the CEMP and briefed to all relevant personnel involved in the implementation for continual improvement.

1.5.3 Management Review

Environmental performance on this project will be reviewed as part of the periodically by the Sustainability Lead. Project performance will be reported to the board based on the company key performance indicators and environmental objectives on a monthly basis for each contract division.

1.5.4 Communication

The contents of the CEMP will be communicated to all persons deemed responsible within the plan and those visiting and conducting activities onsite. Once communicated, records must be kept of this communication.

1.6 Project Objectives & Improvement

1.6.1 Construction Environmental Improvement

Theme	Description	Measurement	Review
Environment Inspection	Construction environmental inspections serve a critical role in ensuring that construction activities comply with environmental regulations, standards, and best practices. The purpose of these inspections is multi-faceted, with a primary focus on safeguarding the environment, public health, and the well-being of surrounding communities.	Sustainability Lead to undertake 1 (focussed) environment inspection per month	Project management team to review inspection outcomes and drive actions delivering sitewide improvements
Data Submissions	Monitoring sustainability data regularly creates opportunity to act on unsustainable use of resources or challenge conditions or practices. Typically driving efficient use of resources will create cost savings in addition to reducing the projects impact.	Project team to complete the sustainability data submission for each month by the first week of the following month	Data to be reviewed by the project management team, trends, and findings to be acted on and reported as improvements

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Waste Management	Waste generation is a significant environmental impact of the project. Monitoring the compliance of waste movements is integral to managing compliance requirements and ensuring wastes reach sustainable destinations.	Legal Requirement: Compliance monitoring is a statutory obligation, not an improvement measure.	Any non-compliances with waste tickets to be escalated through the head of sustainability to put controls in place ensuring future compliance
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1.7 Structure and Responsibility

Environment compliance responsibilities are defined within the environment management system document Environment Roles and Responsibilities. The operational team structure and responsibilities will be further defined in the Construction Phase Plan, Environment Minimum Requirements, and contractual agreements.

1.8 Assumptions & Limitations

This Construction Environmental Management Plan (CEMP) and the information gathered to make an assessment is subject to the following assumptions and limitations.

- This CEMP only pertains to the **River Wall Defence** works, for the demolition and constriction please see 679-TSL-ESG-CEMP
- This CEMP pertains only to the flood defence / river works package. For the main works CEMP, refer to 679-TSL-ESG-CEMP.
- That where the client provided environmental information is utilised for the purpose of preparing this report so that the information is valid, correct and collected through recognised methodologies
- That any third-party data (when referenced in this plan) is correct and up to date as of the point the information is gathered
- That the scope of works provided covers all known activities on site for assessment within this CEMP, such as preconstruction investigation activities. It is the responsibility of the project delivery team to update the Sustainability Lead prior to changes in any scope of works
- That where client or alliance procedures, standards or information is to be utilised in preference of the TSL Environmental Management System of documents that this is made known prior to the writing of this plan and that the third-party document sets equivalent or better practice than the TSL counterpart
- This Construction Environmental Management Plan is limited to use for the assessment of works and delivery of the scoped works included in section 2.0 of this report only

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2.0 Project and Site Description

2.1 The Client

Cereal Partners UK (CPW) is an established breakfast cereal manufacturer and the UK joint venture between Nestlé and General Mills. The business produces and distributes a wide portfolio of well-known cereal brands for the UK market, with a strong focus on product quality, food safety and responsible sourcing. CPW is committed to sustainability, including reducing environmental impacts across its operations and supply chain, supporting responsible agriculture, and promoting healthier choices for consumers.

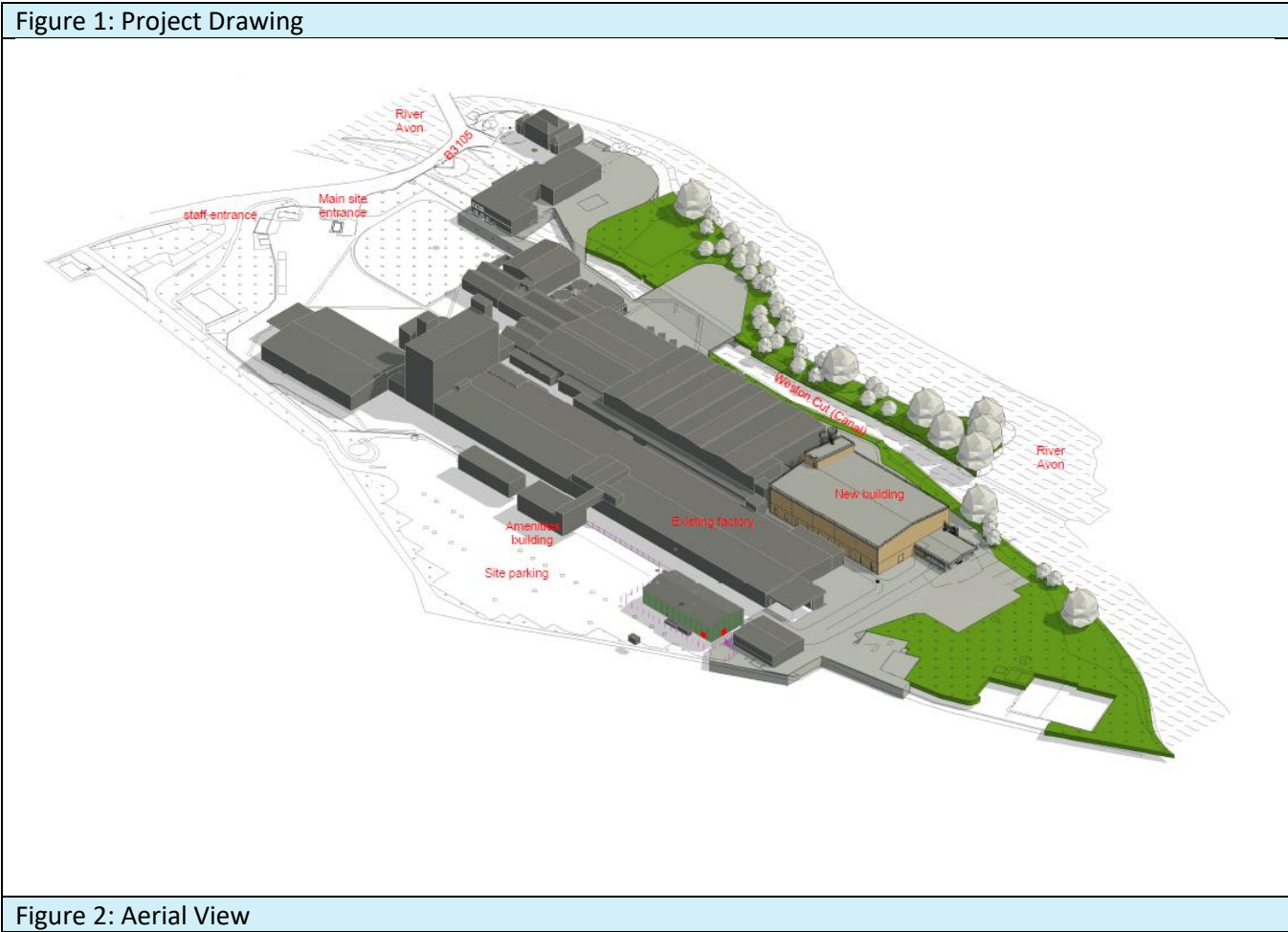
2.2 Project Details

Name	Project Whitehorse
Project Description	The works comprise the construction and modification of flood defence within the existing Cereal Partners UK site at Staverton, in proximity to the River Avon and Weston Cut. The scope includes the installation of sheet piling, construction of reinforced concrete flood walls, and the addition of reinforced concrete capping to existing wall structures to improve flood resilience. Additional works include the installation of demountable flood gates and posts at the bridge interface, raising of kerbing and thresholds, and localised demolition of existing pallet storage structures. The works will also involve excavation, foundation construction, and potential service diversions to facilitate the flood defence infrastructure. Construction activities will use typical heavy plant including piling rigs, excavators, dumpers and telehandlers.
Local Environment	The works are located within an operational industrial site at Staverton, comprising predominantly hardstanding, buildings and managed areas. The immediate surroundings include the River Avon and Weston Cut along the site boundary, which form the primary environmental receptors and support associated riparian habitats. The wider setting is characterised by a mix of industrial land use, boundary vegetation, and watercourse corridors, with sensitive ecological features concentrated along the river edge.
Socioeconomic Landscape	Trowbridge is the closest town to Staverton, it has experienced significant socioeconomic changes, marked by population growth, economic diversification, and concerted regeneration efforts. The town's population increased from 32,304 in 2011 to 43,744 by 2021, making it the most populous area in Wiltshire outside of Swindon. This growth has been accompanied by challenges, including areas of deprivation within Trowbridge, where residents face higher levels of fuel poverty and a notable gap in life expectancy compared to less deprived areas. Economically, Trowbridge has transitioned from its historical reliance on the woolen cloth industry to a more diversified economy encompassing manufacturing, retail, and services. The town has benefited from initiatives like the Wiltshire Towns Programme, which allocated £1 million annually from 2021 to 2025 to support high street businesses and employment. Additionally, the £16 million grant from the Future High Streets Fund has facilitated significant town centre improvements, including pedestrian-friendly upgrades and the regeneration of key areas like the Town Hall. These efforts aim to revitalize the local economy, attract new businesses, and enhance the quality of life for residents.

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Area	Flood defence works sit within the existing Cereal Partners UK Staverton site at BA14 6PG and are focused along the site perimeter adjacent to the River Avon / Weston Cut interface. The wider Staverton factory campus is already operational, with the flood works located in discrete linear sections rather than across one single development plot. In terms of scale, the ecology report describes the proposed flood resilience measures as extending for approximately 490 metres in length, including kerb replacement, new concrete kerbs and flood gates. The works are split across multiple zones and include localised areas for sheet piling, reinforced concrete wall/capping works, bridge gate installation and raised kerbing, so the footprint is best described as a linear boundary intervention rather than a standalone building footprint.
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2.3 Site Location



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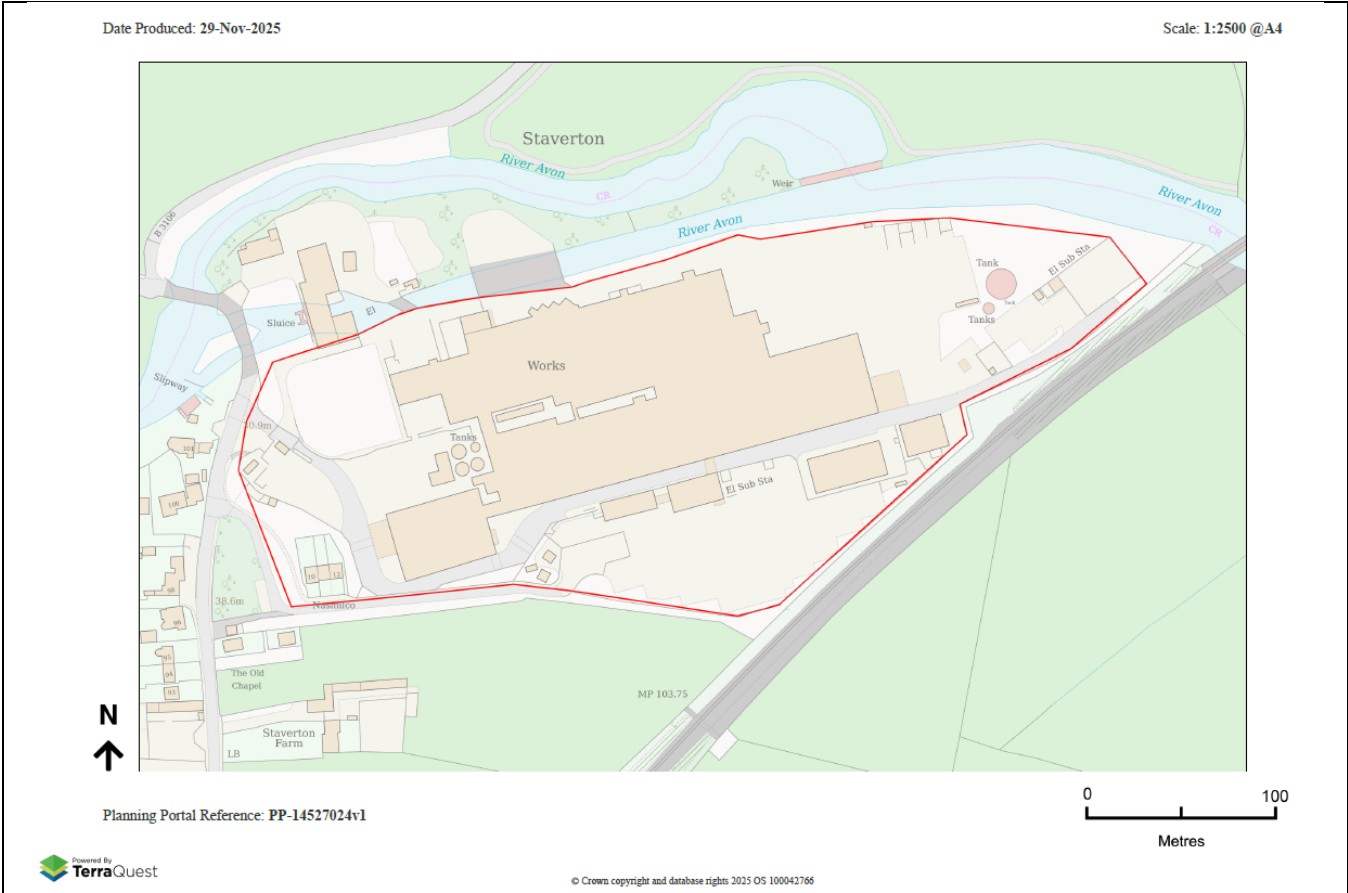
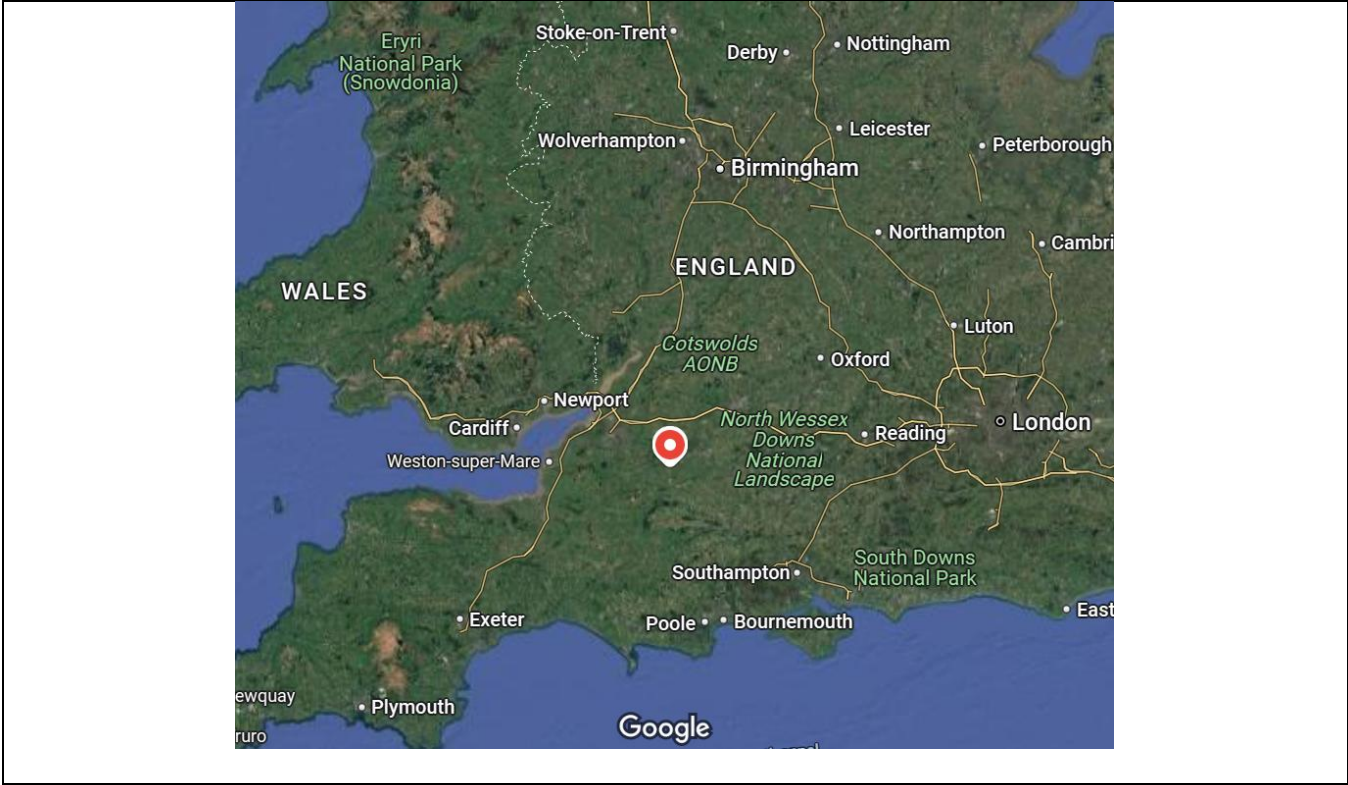


Figure 3: Site Location



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2.5 Programme Information

2.6 Access & Parking

Figure 4: Site Logistics Plan



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2.7 Plant & Equipment

To be updated once construction phase commences.

Figure 5: Plant & Equipment					
	Construction Element				
	Trief curb install	Sheet pilling install	Flood gates install	Raise of wall	non-return valves
Tracked Excavators	✓	✓	✓		TBC
Handheld Pneumatic Breaker	✓		✓		TBC
Dump Trucks	✓	✓	✓	✓	TBC
Vibratory Rollers					
Steel Pile Casing Placements					
Gas Cutters for Pile Steel Casings					
Piling Rigs		✓			
Tracked Mobile Cranes			✓		
Mobile Telescopic Cranes					
Mobile Generators					
Water Pumps			TBC		
Mobile Floodlights with Generators					
Concrete Mixer Trucks			✓	✓	
Truck Mounted Concrete Pumps			✓	✓	
Poker Vibrators			✓	✓	
Vibrating Finishing Beams					
Air Compressors					
Diamond Cutting Tools / Saws	✓		✓		✓
Road Sweepers	✓		✓	✓	✓
Core Drill					
Scaffold					TBC
Mobile Access Platforms					✓
Delivery Trucks	✓	✓	✓	✓	✓
Skips and Skip Truck	✓	✓	✓	✓	✓

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2.8 Delivery & Support Team

Please see the below for the proposed team for the project.

Figure 6: Project Team	
Internal TSL Team	
Name	Role
Michael McDonnell	Group Chief Operating Officer
Steven Penglase	Chief Operating Officer (COO) – UK
Patrick Denton-Cooke	Group Chief Construction Director
David Bell	Group EHS Director
David Hitchin	Head of EHS – UK
James Johnston	Regional EHS Manager
Martin Gibbs	Project Director
Jamie Moore	Senior Project Manger
Wade O’Sullivan	Project Manager
Joe Wise	Health & Safter Manager
James Thornton	Group Director, Compliance & Sustainability
Matthew Clifford	Sustainability Lead
Client	
	Cereal Partners UK
Architect	
	Stride Treglown

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3.0 Aspect & Impact Guidelines

3.1 Project Risk Assessment

This Construction Environmental Management Plan (CEMP) is a site-specific bespoke plan for the works as outlined in section 2.0.

The plan is used to calculate the risk of environmental impact from site activities in accordance with the likelihood and severity of impact. Actions, controls, and mitigation are then prescribed in the plan commensurate to the level of risk that will reduce it to either neutral or positive outcomes.

The risk matrix in section 3.2 (below) is used as the standardised framework for assessing risk and matches that used in the TSL Environmental Management System (EMS).

3.2 Risk Assessment Template

PROJECT ENVIRONMENT RISK MATRIX								
LIKELIHOOD OF OCCURRENCE	Certain Constant in normal conditions	5	0	5	10	15	20	25
	Likely Intermittent in normal conditions	4	0 POSITIVE CONSEQUENCE	4	8	12	16	20
	Occasional Potential to occur (e.g seasonal variation)	3		6	9	12	15	
	Unlikely Would not occur unless under specific conditions	2		4	6	8	10	
	Not Predicted An occurrence not foreseen	1		2	3	4	5	
			0	1	2	3	4	5
SEVERITY OF CONSEQUENCES	Scale & Impact	Positive Impact - net gain in action (e.g. new habitat)	Insignificant Impact - to the environment (no net gain / loss)	Minor Impact - short lived or temporarily contained	Managed Impact - short term easily remediated	Major Impact - not reversible within a year, input required for remediation	Major Long-Term Impact - irreversible and likely to continue	
	Legal / Policy / Other	Shaping Law & Policy	Not applicable to policy or legislation	Insignificant to policy / legislation	Effects performance linked to policy / legislation	High potential to breach legislation	Breach in legislation	
	Reputation	Positive impact on public relations	No impact on PR	Verbal complaint - short lived PR impact	Formal, localised, complaint - readily resolved	Formal compliant, local coverage - long term action required	Serious complaint, and national / global news coverage	
			Positive Impact - Creation of new opportunities for sustainable growth	Low Risk - Negligible / positive outcome from environmental aspect management	Moderate Risk - Probable impact requiring controls to avoid or reduce	Significant Risk - Likely impact at an unacceptable severity. Requires intervention to stop /		

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4.0 Summary Plan

4.1 Licenses, Consents & Permits

Type	Description	Approval & Period Licenced	Owner
Non-potable water supplied by client	Temporary non-potable water supply to the site provided for construction activities only.	Agreement to be reviewed with CPW.	TSL
Foul via tank and regularly removed by licensed contractor	Temporary foul drainage managed via sealed holding tank, with contents removed routinely by a licensed waste contractor.	Waste removal undertaken in accordance with Duty of Care requirements. Valid for the duration of temporary works.	TSL

4.3 Complaint Management

Please refer to: **679 Project Whitehorse - Complaint Management**

5.0 Water Resources

Site Information

Surface Water, Groundwater & Flood Defence Works

The site is located within the River Avon valley at Staverton, Wiltshire (BA14 6PG), within the existing Cereal Partners UK operational factory campus on predominantly hardstanding and developed surfaces. The River Avon and the Weston Cut lie immediately adjacent to the northern boundary, with the nearest parts of the proposed flood defence works located approximately 10m from the river bank, placing the water environment as a primary receptor. The flood resilience works comprise of replacement and installation of raised concrete kerbs, flood gates, and localised sheet piling and shallow flood defence measures.

The site is identified on the Environment Agency Flood Map for Planning within Flood Zones 2 and 3. Supporting flood risk information confirms that the flood resilience measures are intended to improve site safety and flood resilience without increasing flood risk elsewhere, and that the main service yard will continue to flood during extreme events. Groundwater conditions are influenced by the River Avon corridor, with shallow groundwater previously identified at approximately

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0.89m to 1.5m below ground level, and infiltration methods are therefore not considered appropriate. Existing drainage infrastructure also interfaces with the flood defence works, including multiple drainage outfalls to the leat / Weston Cut, which require careful management to maintain the integrity of the flood defence line.

Pollution Prevention Measures – River Avon / Weston Cut Corridor

Given the proximity of the River Avon and Weston Cut, and the adjacency of the Bristol Avon River Local Wildlife Site, the following pollution prevention measures will be implemented throughout all phases of the flood defence works.

General Principles

- No discharge of contaminated water, silty runoff, concrete washout or other pollutants will be permitted to enter the River Avon, Weston Cut, associated drainage systems, or existing outfalls connected to the leat
- All works will be undertaken in accordance with best practice guidance including Environment Agency Guidance for Pollution Prevention and CIRIA C532 / C741
- Construction activities will adopt a precautionary approach due to the proximity of controlled waters, flood defence infrastructure and the Bristol Avon River LWS

Site Setup and Buffer Zone

- A defined exclusion / buffer zone will be maintained adjacent to the River Avon / Weston Cut corridor where practicable
- No storage of plant, fuels, chemicals, materials or waste will be permitted within this area
- Stockpiles and temporary materials will be located on impermeable surfaces and away from drainage pathways leading toward the river or leat

Surface Water and Runoff Control

- Silt fences, drain covers, bunding and other suitable runoff controls will be installed to prevent sediment-laden runoff entering drainage systems or watercourses
- Settlement tanks, silt busters or equivalent treatment measures will be used where dewatering or pumping is required
- A “permit to pump” system will be implemented for any discharge of water from excavations or temporary works
- Existing drainage outfalls and temporary interfaces with the drainage network will be inspected and managed during the works to prevent uncontrolled discharge or backflow

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Pollution Prevention (Fuels, Chemicals, Concrete)

- All fuels, oils and chemicals will be stored in bunded containers (minimum 110% capacity) and located away from the river boundary and drainage outfalls
- Concrete washout will take place in designated, lined washout areas located away from the northern boundary and water environment
- Spill kits will be available at key risk locations, including plant operating areas, fuel storage areas and along the northern boundary

Dewatering and Groundwater

- No direct discharge to the River Avon or Weston Cut will be permitted
- Excavations associated with kerb installation, localised sheet piling and associated flood defence works may interact with shallow groundwater and standing water
- All dewatering discharge will be subject to water quality checks and appropriate treatment prior to release via approved drainage routes

Emergency Response

In the event of a spill or pollution incident:

- Works will cease immediately
- The source of pollution will be contained using appropriate materials
- The Site Manager will be notified immediately
- The Environment Agency will be contacted where there is a risk of pollution to controlled waters
- All personnel will be trained in pollution prevention and spill response procedures.

Monitoring and Inspection

- Daily visual inspections of drainage controls, pollution prevention measures and river-facing work areas will be undertaken
- Increased inspections will be implemented during heavy rainfall events and during higher risk activities such as concrete works, excavation and sheet piling
- Any failures or deficiencies in control measures will be rectified immediately

Reference Documents:

- Flood Risk Assessment – Staverton Cereal Factory, Flood Resilience Measures (Edenvale Young)
- Ecological Impact Assessment – Staverton Flood Defence (SLR Consulting Limited, 15 October 2025)

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- Preliminary Ecological Appraisal Report – Cereal Partners UK, Staverton (SLR Consulting Limited, 9 September 2025)
- Site Flood Prevention User Requirements Specification, Rev 4 (March 2026)

Average Impact Risk	High	Average Residual Risk	Low
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Activity & Environmental Aspect	Impact Risk			Project Controls and Mitigation	Residual Risk		
	L	S	R		L	S	R
Provision of a potable water supply to site	-	-	-	Possibility of utilising water supply for existing facility with metered supply. This is yet to be confirmed. - Implement water saving measures across the welfare facility, such as auto shut off taps. - Routinely monitor consumption of water to understand and correct behaviour patterns with the aim of reducing consumption.	-	-	-
Run-off of water from site into nearby pathways and receptors	3	3	9	- Site location within River Avon floodplain – runoff protocols to be prioritised - Silt socks and drain covers to be installed on existing yard drainage - Inspect and protect existing gullies, outfalls and drainage runs within the working area - No stockpiles or loose arisings near drainage paths - Stop works and review of controls after heavy rainfall events - Review site setup to map out the flow of water (rainwater for example). Identify pathways and receptors that may be impacted - Regularly inspect bunds across site ensuring they do not overfill due to rainfall	3	1	3

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Average Impact Risk	High	Average Residual Risk	Low
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Activity & Environmental Aspect	Impact Risk			Project Controls and Mitigation	Residual Risk		
	L	S	R		L	S	R
Management of concrete washout water	5	3	15	- TSL site management team to routinely inspect the pits and arrange for waste away once they reach 75% capacity - Concrete washouts located on southern side of works, away from Weston Cut boundary - Excavation pits should be covered during periods of heavy rainfall avoiding the need to pump out rainwater - Parties are encouraged to use the least amount of water possible when washing out concrete. Water supplied by site can be used, including any water captured from rainfall by a gutter / tank system - All parties on site are not permitted to discharge washout water to ground or any other location on site other than the wash out pits - Any accidental discharges of concrete washout water to ground must be immediately reported to the TSL management team - All parties pouring and working with concrete on site must be briefed on the mitigation regarding concrete washout	5	1	5
Wash down of plant, equipment, and vehicles	4	3	12	- Designated vehicle, plant, and equipment washdown areas are to be set by TSL on site should there be a need during the phase of the project - No washdown in the northern boundary / river-facing area - Any water used for washing should be captured at source and disposed / treated before being discharged with permission (also deploying secondary treatment measures) - There are no biosecurity concerns on site, however if this changes the advice in the CEMP will also need a review - Wheel / track cleaning controls if mud transfer becomes an issue	4	1	4
Piling activities and disturbance / interaction with groundwater	5	4	20	- Following planning and during the detailed design of piling the team must review possible impacts on groundwater supplies. - No open boreholes to be left unattended - Spoil to be stored on impermeable surface Sheet piling methodology to be agreed before works Piling exclusion zones near known drainage and utility interfaces	3	2	6

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Average Impact Risk	High	Average Residual Risk	Low
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Activity & Environmental Aspect	Impact Risk			Project Controls and Mitigation	Residual Risk		
	L	S	R		L	S	R
Management of standing water	4	4	16	- Any standing water to be inspected with inspections captured in InnDex - Standing water to be inspected for sheen / turbidity / cementitious contamination before pumping - Any water to be discharged by pumping via sump - If visual signs of contamination observed, water to be removed from offsite	2	3	6
Management of effluent from toilet and washroom block	3	5	15	- Toilet and washroom blocks in welfare facilities must either be chemical or connected to the mains effluent system with permission from the effluent network provider. - Water from toilets and washroom blocks must not be discharged to ground. - Implement water saving devices in the toilet and washrooms. - Display signs on site regarding conservation of water and good water consumption behaviours.	1	2	2
Dewatering of excavations / groundworks during construction (rainfall or groundwater)	4	5	20	- Ensure to review the quality of the water before discharging - design mitigation to treat / capture any contaminants in the water - Ground investigation confirms groundwater at 0.89 – 1.5m below ground level - No discharge to River Avon/Weston Cut - Discharge route to connect to existing drainage outfall to Weston Cut, as per FRA drainage strategy - Settlement tank/silt-buster required if dewatering of excavations - No discharge of water without quality inspection - Any discharging systems must be designed and managed in accordance with the TSL internal “permit to pump”	2	4	8
COSHH (including fuel oils) spill, leak & discharge events	3	5	15	- COSHH to be stored in designated areas of the site in containers or double skinned storage units, away from northern river boundary - Large COSHH holdings such as barrels must be stored on bunded trays that has 110% if the capacity or 25% of total aggregated storage capacity (whichever is greater) - COSHH registers shall be up to date and MSDS sheets must be readily available. - Ensure all parties on site have been briefed to a pollution response plan, have trained pollution response team members and are aware of the escalation process for environmental incidents	3	1	3

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Average Impact Risk	High	Average Residual Risk	Low
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Activity & Environmental Aspect	Impact Risk			Project Controls and Mitigation	Residual Risk		
	L	S	R		L	S	R
				- All plant shall have secondary containment/trays underneath engine compartments where practicable - Spill kits positioned at fuel store, concrete and around northern boundary locations			
Use of water for dampening down dust and in use for road sweeping	4	2	8	- Use technology that maximises the efficiency of water consumption - No abstraction from River Avon - Avoid excessive dampening down near northern drainage runs - Review opportunities to capture rainfall to contribute to damping down - Deploy drain covers and mitigation to prevent the washing of silty water into effluent systems	4	1	4

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6.0 Natural Environment

A Preliminary Ecological Appraisal (PEA) and Ecological Impact Assessment (EclA) were undertaken to inform the proposed flood defence works at Staverton. The site comprises predominantly hardstanding, factory buildings and associated infrastructure within an operational industrial complex, with ecological value concentrated along the northern boundary adjacent to the River Avon corridor and Bristol Avon River Local Wildlife Site (LWS), located approximately 12m north of the site. The River Avon and associated riparian habitats form the principal ecological receptor and provide habitat connectivity along the floodplain.

The proposed flood resilience measures comprise replacement and installation of raised concrete kerbs, flood gates, and localised sheet piling / shallow flood defence works. The ecological assessments confirm that the majority of the working area is of low ecological value and is dominated by hardstanding and managed grassland, although the Bristol Avon River LWS remains sensitive to indirect impacts such as pollution, runoff, noise, lighting, construction disturbance and the movement of plant and materials in close proximity to the watercourse.

The ecological assessments identify that no statutory designated sites lie within the red line boundary, but confirm that the Bristol Avon River LWS is a non-statutory designated site with potential to be indirectly affected by the works. Habitats within the working area are generally common and widespread. The key ecological constraints identified for the flood defence works are the adjacent river corridor / LWS, the sensitivity of the water environment to spills, runoff, debris and in-situ concrete works, and the potential for impacts to common amphibians, reptiles and other mammals, including hedgehog, where limited areas of grassland or edge habitat may be disturbed.

Ecological protection measures will be established prior to the commencement of relevant construction activities, including site establishment, excavation, kerb works, sheet piling and any vegetation disturbance. Where grassland or edge habitat is to be affected, sensitive clearance measures will be implemented, including pre-clearance checks and a staged approach where required. All works will be undertaken with due regard to the adjacent River Avon corridor, with pollution prevention, runoff control, debris management, biosecurity measures and site lighting managed to avoid impacts on retained habitats and ecological connectivity.

Tree and vegetation protection measures will be implemented where works interface with retained woodland, trees or boundary vegetation. Protective fencing and exclusion measures will be maintained where required to prevent accidental damage to retained ecological features adjacent to the River Avon corridor. This section of the CEMP addresses the ecological requirements associated with the flood defence works and should be read in conjunction with the project-specific pollution prevention, flood risk and water management controls set out elsewhere in this plan.

Reference Documents:

- Preliminary Ecological Appraisal Report – Cereal Partners UK, Staverton (SLR Consulting Limited, 9 September 2025)
- Ecological Impact Assessment – Staverton Flood Defence (SLR Consulting Limited, 15 October 2025)

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Avg. Impact Risk	Medium	Avg. Residual Risk	Low
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Activity & Environmental Aspect	Impact Risk			Project Controls and Mitigation	Residual Risk		
	L	S	R		L	S	R
Activities in relation to all wildlife activity	3	3	9	- The site lies adjacent to the River Avon corridor and Bristol Avon River Local Wildlife Site, which form the primary ecological receptor - All personnel on site must maintain a watching brief for signs of wildlife, including resting places, nests, refuges or mammal activity within retained habitat and grassland edge areas - If any animal is identified during the works, it must not be disturbed, touched or handled and activity within the immediate vicinity must stop until appropriate advice has been obtained - No storage of materials, plant or waste will be permitted within retained riverside or habitat buffer areas - Care must be taken when accessing and leaving the working areas to avoid unnecessary damage to retained vegetation and habitat edges - Precautionary measures will be taken to prevent the introduction or spread of invasive non-native species, including clean, check and dry procedures for tools and machinery where relevant - If any invasive species are suspected to be present, this must be reported to a suitably qualified ecologist for advice before works continue in that area - Clean, check and dry procedures for tools, boots, wellies and machinery before arrival on site - Toolbox talks on invasive species and pollution control Bats: - The ecological assessments identify the River Avon corridor as having value for commuting and foraging bats, although the flood defence working area itself is of negligible to low bat value and no bat roosts were identified within the works footprint - Construction lighting will be controlled to avoid unnecessary light spill toward the northern boundary, river corridor and retained vegetation - Directional, hooded and low-level task lighting will be used where practicable. - A toolbox talk will be delivered to relevant operatives on the procedure to follow if a bat is encountered during work Nesting Birds	3	1	3

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Avg. Impact Risk	Medium	Avg. Residual Risk	Low
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Activity & Environmental Aspect	Impact Risk			Project Controls and Mitigation	Residual Risk		
	L	S	R		L	S	R
				- Vegetation clearance to be undertaken outside of the bird nesting season (March–August inclusive), where practicable - If clearance is required during nesting season, a pre-commencement nesting bird check will be undertaken by a qualified ecologist - Retained woodland and hedgerows to be protected from accidental damage during construction Amphibians / Reptiles / Other Mammals: - Eels have been identified in the River Avon after review with the local authority and EA. River defenece works will now not take place until the 28th of May, to ensure migration patterns are not affected - The EcIA identifies potential for limited impacts to common amphibians, reptiles and other mammals, including hedgehog, where edge habitat or grassland is disturbed - Where relevant habitat is to be disturbed, pre-clearance checks will be undertaken and vegetation / turf removal will proceed in a controlled and staged manner to allow fauna to disperse - Any habitat stripping in suitable areas will be undertaken under an appropriate precautionary method of works, with ecological supervision where required			
Activities in relation to nearby habitat (grassland, hedgerows, and trees / woodland)	3	2	6	- Retention of hedgerow, scrub and trees where possible and work shouldn't impact off-site habitats - Storage, vehicle parking, plant movements and any non-authorised works activity must not occur within tall, vegetated land or within the root protection area of any tree - TSL site management team will maintain visual monitoring of nearby vegetation for signs of dust or other impacts. Action will be taken where necessary to ensure surrounding vegetated areas will not be impacted and if so corrected to original state	3	1	3
The dismantling of log piles, stones, heaps of vegetation and branches	3	3	9	Any removal of small vegetation or scrub to be undertaken outside bird nesting season unless ecologist confirms otherwise	3	1	3

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Avg. Impact Risk	Medium	Avg. Residual Risk	Low
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Activity & Environmental Aspect	Impact Risk			Project Controls and Mitigation	Residual Risk		
	L	S	R		L	S	R
				- If any animals are identified, then the activity should stop, and the Sustainability Advisor/Head of ESG & Sustainability must be contacted - Remove material off site for waste disposal - Precautionary steps to be taken inclusive of storing materials off the ground and capping any open excavations and dismantling any piles of rubble by hand			
Handling soil resources and managing contamination	4	3	12	Refer to the waste and resource management section of the CEMP for information on ground contamination. - Ground Investigation confirms shallow groundwater and variable made ground - Ensure to review soil testing and contamination information before handling any soil material won from site - No discharges of chemicals, oils, or concrete washout water to soil - Vehicle and plant washdown can only occur in permitted areas of the site - Clean soils must be handled in accordance with a soil management plan, moving, storing, and planning for re-use - Stockpiles located away from River Avon boundary	4	1	4
Management of waste and material stockpiles	3	3	9	- Cover / smooth down all wastes and materials to prevent animal access, bird nesting - Materials to be managed to prevent windblown debris entering River Avon corridor - Ensure to smooth down stockpiles at their base to prevent animal access - Materials & stockpiles to be covered where possible to prevent wildlife access & activity - Do not leave stockpiles unattended on site without regular observation for animal activity - The site will implement a strict clean down procedure to avoid transporting soils off site or importing offsite soils	2	2	4

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7.0 Noise & Vibration

Construction noise and vibration have been assessed within the SLR Noise Assessment (December 2025), which concludes that effects will be temporary and manageable through the application of Best Practicable Means in accordance with BS 5228. The site is located within an established industrial setting, with sensitive receptors limited to nearby residential properties and heritage assets, and no significant adverse impacts are predicted when mitigation measures are implemented. Noise-generating activities will be controlled through plant selection, restricted working hours, traffic management and, where required, monitoring and community liaison.

Referenced Documents:

- Noise Assessment – Cereal Partners, Staverton (SLR Consulting Ltd, December 2025)
- Transport Assessment – White Horse Factory Building (October 2025)
- Planning, Design and Access Statement – White Horse Factory Building (November 2025)
- BS 5228-1:2009+A1:2014 Code of Practice for Noise and Vibration Control on Construction Sites

Site hours are as follows: 7:30 – 18:00 Mondays to Fridays and 8:00am–13:00pm on Saturdays. No working on Sundays or Bank Holidays.

Avg. Impact Risk	High	Avg. Residual Risk	Low
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Activity & Environmental Aspect	Impact Risk			Project Controls and Mitigation	Residual Risk		
	L	S	R		L	S	R
Note 1: A Community Liaison Protocol will be developed during site mobilisation and shared with Cereal Partners UK for approval.							
Site access and egress	4	2	8	• Access must be through designated, access controlled, site entrances. All parties entering site must adhere to the general access and induction requirements • Construction traffic to use existing White Horse Business Park access from B3105 only • No alterations are to be made to the site access and egress points • Do not congregate outside the access point unless for specific reasons (fire drills / emergencies / stand downs) • Any out of hours site access must be defined in the community liaison protocol with mitigation specified for managing community impacts	2	1	2

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Avg. Impact Risk	High	Avg. Residual Risk	Low
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Activity & Environmental Aspect	Impact Risk			Project Controls and Mitigation	Residual Risk		
	L	S	R		L	S	R
NRMM (Non-Road Mobile Machinery)	4	3	12	- NRMM shall be operated by suitably trained and qualified operators. - All machinery shall be fitted with silencers and shall be regularly maintained ensuring optimum operation - Any NRMM and machinery that is excessively noise shall be stood down and removed from site if repairs cannot be made - Engine covers must be used on all NRMM when in operation - Electric or super silenced plant and machinery must be used in preference of older plant and machinery - Avoid operation of plant and equipment first thing in the morning and last thing in the day if possible - Out of hours works must be planned with the TSL Sustainability Lead for the project - Consideration must be given to extra noise attenuation to meet planning requirements - White noise reversing sounds shall be preferred over older “beeping” or horn like sounds	2	2	4
Construction of piles and foundations and noise and vibration impacts on community	5	4	20	- Piling and foundations are not permitted to be constructed out of hours. - Contractors on site must include noise attenuation in the RAMS for piling and foundation activities. - At source noise mitigation shall be deployed should the piling activity produce excessive noise. This can include shrouds, curtains, and physical barriers such as extra hoarding. - Quiet hours shall be built into the day to reduce noise disturbance - Noise monitoring must be setup prior to the sheet pile installation and operate during the pile installation. A procedure must be established for monitoring and responding to noise data.	4	1	5
Out of hours working	2	5	10	- Out of hours working not required for this project, but will be reviewed if required and necessary - Wiltshire Council to be contacted subject to any requirement for working out of hours	1	3	3
Operation of fossil fuel generators	3	2	6	Fossil fuel generators shall be avoided wherever possible. With energy consumption coming from the grid supply in preference of other solutions	1	2	2

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Avg. Impact Risk	High	Avg. Residual Risk	Low
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Activity & Environmental Aspect	Impact Risk			Project Controls and Mitigation	Residual Risk		
	L	S	R		L	S	R
				Electric plant and equipment should be optioned to reduce the need for other power arrangements on site			
Construction traffic	3	2	6	- All construction traffic to keep to designated access routes to site - When procuring goods / services it's the responsibility of the team procuring to disclose access arrangements for the site - A member of the TSL team is responsible for monitoring the condition of the nearby roads used for construction traffic. - Construction traffic must be timed / programmed throughout the day as to not cause a nuisance on or off site. Deliveries and vehicles must be planned for appropriate hours of the day - No idling onsite, this will be communication to all subcontractors through induction and toolbox talks	4	1	4
Traffic disturbances	3	2	6	Should construction and site activity cause traffic in the local area – the situation must be immediately reviewed by the site team with an action plan in place within 48 hours of the traffic incident	3	1	3
Excessive Noise – Monitoring & Responding to Limits Being Exceeded	5	2	10	- The most effective mitigation against complaints is using noise data to fine tune activities to reduce noise before complaints are escalated. - Noise monitoring shall be complete using appropriate, calibrated equipment and results shall be interpreted by a trained or qualified person - Noise data shall be reviewed for particularly noisy activities or out of hours works. TSL site management team shall demonstrate best practical means to reducing noise Responding to When Noise Limits are Exceeded - Review sound pressure levels (SPL) in decibels (dB) to compare against predefined limits - Identify patterns in noise levels across different times, days, and site activities - Link peaks in noise data to construction activities (e.g., piling, excavating) - Consider external factors such as wind, traffic, or weather that may influence noise readings. - Determine the construction activity responsible for the noise exceedance - Inform TSL project team at earliest opportunity of noise limit exceeded and linked activity	5	1	5

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Avg. Impact Risk	High	Avg. Residual Risk	Low
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Activity & Environmental Aspect	Impact Risk			Project Controls and Mitigation	Residual Risk		
	L	S	R		L	S	R
				- TSL to halt or modify the activity causing the exceedance, if necessary - TSL may enhance the frequency or coverage of noise monitoring if other influences are suspected to confirm impact of construction activities - TSL to agree with client severity of noise breach and whether escalation to local authority is required. Additionally, whether any communications to affected public stakeholders is required - TSL to propose whether additional mitigation, enhanced monitoring or a redesign of activity is required should the noise be excessive, cause considerable impact and is likely to continue or occur again - First report to client is within 24 hours of identifying the noise limit being exceeded - For significantly severe impacts that have confirmed stakeholder complaints TSL shall complete an environment investigation report			
General Noise	4	3	12	- Access to noisy areas will be restricted to essential personnel only in order to prevent exposure to potentially high noise levels. Teams working in high noise areas will be briefed on environmental requirements to control noise - Community letters shall be sent out regularly updating public receptors on working hours and phase of works. The letter shall also include reporting / escalation process for the public to report high noise disturbance	2	2	4

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8.0 Dust & Air Quality

Dust impacts associated with the proposed flood defence works, including localised demolition, excavation, sheet piling, kerb replacement and associated construction activities, have been assessed in accordance with IAQM Guidance within the Air Quality Assessment (SLR, October 2025). The assessment identifies a worst-case medium risk of dust soiling and a low risk to human health. The works are located within an operational industrial setting; however, the River Avon corridor and Bristol Avon River Local Wildlife Site remain sensitive receptors in close proximity to the northern boundary and appropriate dust control measures will therefore be maintained throughout the works.

Mitigation will be implemented in line with IAQM best practice and Wiltshire Council requirements, including water suppression where required during excavation and breaking activities, controlled handling of materials, minimised drop heights, covered skips and stockpiles where necessary, speed management on site, avoidance of dry sweeping and burning, and regular inspection of work areas and nearby retained habitat. Dust controls will be applied to prevent migration of dust and debris toward the River Avon corridor, adjacent vegetation and surrounding receptors. A Dust Management Plan will be incorporated within the CEMP, alongside a clear complaints procedure and inspection log.

Reference Documents:

- Air Quality Assessment – Cereal Partners, Staverton (SLR Consulting Ltd, 30 October 2025, Rev 2.0)
- IAQM Guidance on the Assessment of Dust from Demolition and Construction (v2.2, 2024)

Avg. Impact Risk	High	Avg. Residual Risk	Low
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Activity & Environmental Aspect	Impact Risk			Project Controls and Mitigation	Residual Risk		
	L	S	R		L	S	R
Management of dust in proximity to open, vegetated space and nearby public land uses	4	3	12	See information on contaminated soils in the waste and resource section of this report. - Reduce groundworks activities during high-speed winds - Targeted water suppression to be used during demolition and excavation activities, particularly along the northern boundary adjacent to the River Avon corridor and public footpath - Damp down soil during excavation activities to reduce dust generation - Clean plant and equipment to reduce soil / mud debris drying and creating dust	4	1	4

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Avg. Impact Risk	High	Avg. Residual Risk	Low
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Activity & Environmental Aspect	Impact Risk			Project Controls and Mitigation	Residual Risk		
	L	S	R		L	S	R
				- Erect physical barriers in front of vegetated and pedestrian areas to prevent dust movement towards sensitive receptors - Reduce the period where bare earth is exposed on site, covering permanently with the landscaping or temporarily with covers / other materials. If soil is to be exposed for a long period of time allow it to seed as plant roots will reduce soil erosion and dust generation - Hard surfaces must be regularly maintained to reduced dust, dry-sweeping debris regularly and disposing to relevant waste area			
Construction vehicles, plant, equipment, generators (non-road mobile machinery) requiring fossil fuel for power	4	3	12	- Use of fossil fuel powered plant, equipment, vehicles will pollute local air with exhaust fumes. Where possible use biofuels or ad blue to reduce the impact on local air quality - All plant to comply with current NRMM emission standards where applicable - Replace equipment, plant, and machinery on site with electric or hydrogen alternatives to avoid exhaust emissions into local air - Don't leave plant, equipment or vehicle engines idling - Keep all plant, equipment and vehicles serviced and in good operating condition - Adhere to the speed restrictions set onsite and offsite	4	1	4
Local health impacts and vegetation damage due to dust	3	4	12	- Site team shall establish a protocol for inspection and monitoring or activities. Environmental audits shall include the review of dust generating activities - Dust controls to focus on preventing migration toward the River Avon riparian vegetation and adjacent public rights of way - All RAMS for demolition and earthworks to include specific dust suppression measures in line with IAQM guidance - RAMS for specific activities must include actions to prevent, reduce and control dust - If dust spreads offsite and requires cleaning seek advice from the Sustainability Lead as to management as the dust may be hazardous	3	1	3

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9.0 Odours and Lighting

Avg. Impact Risk	Medium	Avg. Residual Risk	Low
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Activity & Environmental Aspect	Impact Risk			Project Controls and Mitigation	Residual Risk		
	L	S	R		L	S	R
Management of chemical fumes and odour – considerate working near live facilities.	3	3	9	- Parties must refer to the COSHH assessment and MSDS sheet of any chemical before handling. Risks of odour to the environment and to the person must be evaluated before use - Storage of chemicals and fuels to be located away from the northern boundary (River Avon / Weston Cut) - Chemicals must be safely stored in a well-ventilated container or locker - Any accidents involving the spill, leak or release of chemicals must consider odour impacts and mitigate any impacts - No handling of chemicals in public areas unless a risk assessment including impacts on the public has been complete and approved by TSL	3	1	3
Task lighting for out of hours or out of daylight activities	3	3	9	- Task lighting, if permitted by the TSL management team, must have directional collars to direct light at the source and away from other sensitive receptors - Lighting shall only be on when in use or when its essential for the safety of employees on site - Lighting to avoid spill toward the River Avon riparian corridor and adjacent public footpath - Ideally lighting will be powered by batteries or grid electricity. ICE powered lighting is permitted by must operate on a super silenced generator and specifications of the noise of the plant must be submitted to TSL for review - All lighting must be setup in accordance with a sensitive lighting plan that is in accordance with the bat conservation guidelines set by the Bat Conservation Trust	3	1	3
Management of effluent and drainage odours	3	2	6	- Odours from effluent is not expected under standard operating conditions. If any party smells a strong effluent / sewage odour outside of welfare facilities must report this to TSL immediately - Welfare facilities to connect to mains or self-contained chemical units only (no discharge to ground)	3	1	3
Site external lighting	3	2	6	Temporary external lighting is permitted so long as it meets any conditions of planning / building permits if applicable	3	1	3

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Avg. Impact Risk	Medium	Avg. Residual Risk	Low
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Activity & Environmental Aspect	Impact Risk			Project Controls and Mitigation	Residual Risk		
	L	S	R		L	S	R
				- Temporary external lighting shall only be setup where it's essential to demarcate the boundary and must not disturb local sensitive receptors - Lighting to avoid glare toward residential receptors west of B3105			

10.0 Transport, Traffic and Vehicles

Construction traffic will use the White Horse Business Park access from the B3105, with no new access points proposed and all HGV movements managed within the established factory service yard. Deliveries will be scheduled and coordinated to avoid peak periods where practicable, and no vehicle waiting on the B3105 will be permitted. All plant, NRMM and construction vehicles will comply with relevant emission standards, with idling minimised and internal speed limits onsite. With these controls in place, transport and traffic impacts during construction are expected to be temporary, localised and not significant.

References:

- Transport Assessment – White Horse Factory Building, Staverton (October 2025)
- Planning, Design and Access Statement – White Horse Factory Building (November 2025)
- Air Quality Assessment – White Horse Factory Building (SLR Consulting Ltd, 30 October 2025, Rev 2.0)

Avg. Impact Risk	Medium	Avg. Residual Risk	Low
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Activity & Environmental Aspect	Impact Risk			Project Controls and Mitigation	Residual Risk		
	L	S	R		L	S	R
Traffic disturbances	3	2	6	- The site is accessed via the existing White Horse Business Park entrance from the B3105; no new access points are proposed (Transport Assessment, Oct 2025) - Construction traffic to utilise established HGV routes currently serving the operational factory - No vehicle waiting or stacking on the B3105 permitted	2	1	2

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				- Should construction & site activity cause traffic in the local area, the situation must be immediately reviewed by the site team with an action plan in place within 48 hours of the traffic incident - Any planned significant disruptions to local road networks must be communicated to local stakeholders			
Use of Non-Road Mobile Machinery	4	3	12	- All NRMM to meet current emission standards (Stage V where reasonably practicable) - All non-road machinery must be inspected before acceptance for use on site. TSL will be responsible for authorising the use of plant and machinery through InnDex - Records of plant and machinery specs and servicing must be provided to TSL and recorded on InnDex - Spill kits, extinguishers, safety equipment and manufacturer information must be readily available when operating NRMM - Operators must be trained and competent to use the NRMM - including how to inspect and identify efficiency of plant and equipment - Contractors working on behalf of TSL are responsible for submitting data relating to fuel consumption / mileage of NRMM for monthly reporting	2	2	4
Construction traffic	4	2	8	- Wheel cleanliness monitored before vehicles exit site to prevent debris on B3105 (although no unpaved haul routes are proposed) - Construction vehicles to use the existing factory access only - When procuring goods / services it's the responsibility of the team procuring to disclose access arrangements for the site - A member of the TSL team is responsible for monitoring the condition of the nearby roads used for construction traffic - TSL works with a "Just in Time" procurement approach to reduce the space required on site for storage. Construction traffic must be timed / programmed throughout the day as to not cause a nuisance on or off site. Deliveries and vehicles must be planned for appropriate hours of the day	4	1	4
Vehicles	5	3	15	- Contractors working on behalf of TSL are responsible for ensuring plant, equipment is fully operational and meets the standards expected by TSL - Muddy / dirty vehicles may not be permitted to enter site due to risk of biosecurity. TSL will consider this on a case-by-case basis - Any mud or debris on the public highway to be cleaned immediately - Contractors working on behalf of TSL are responsible for submitting data relating to fuel consumption / mileage of construction vehicles	5	1	5

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11.0 Built & Historic Environment

The Road Bridge over the River Avon, located on the approach to the site, will be protected through controlled construction traffic routing, avoidance of abnormal loading, and adherence to highway safety measures. A precautionary archaeological watching brief will be maintained during groundworks in line with the low archaeological potential identified, ensuring any unexpected finds are managed. With these controls implemented, impacts on the built and historic environment during construction are expected to be temporary, localised and not significant.

References:

- Heritage Statement – Whitehorse Factory Building, Staverton (Stride Treglown, 29 November 2025, Rev 1)
- Planning, Design and Access Statement – Whitehorse Factory Building (November 2025).

Avg. Impact Risk	Medium	Avg. Residual Risk	Low
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Activity & Environmental Aspect	Impact Risk			Project Controls and Mitigation	Residual Risk		
	L	S	R		L	S	R
Management of archaeological risk	1	3	3	- All parties on site must maintain a watching brief for signs of underground structures, metallic objects, bones, pottery, and any other unexpected finds - If a party identifies an item likely to be of archaeological value / an unexpected item of unknown value, then all activity in the vicinity of the find must stop and a member of TSL management team must be contacted	1	1	2
Protection of nearby listed buildings during construction	3	3	9	- Construction works confined within existing industrial campus - Temporary works (cranes, lighting, hoarding) positioned to minimise visual intrusion where practicable - No vibration-intensive works without method statement review	2	2	4
Protection of road bridge over River Avon (Grade II)	3	2	6	- Construction traffic to follow approved HGV routes - No storage or plant stationed near the bridge - Maximum vehicle weights to comply with existing highway restrictions - No parking, idling or queuing of HGVs on or adjacent to the bridge structure	2	2	4

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12.0 Land and Visual Impacts

The flood defence works will be undertaken within the existing operational factory site and comprise a series of linear interventions, including raised and replacement kerbing, flood gates, localised sheet piling, and associated minor civil works along the site perimeter. As the works are largely located within existing hardstanding and developed areas, and the proposed measures are generally low in height and closely related to existing site infrastructure, the visual and landscape effects during construction are expected to be localised, temporary and limited in extent. Sensitive receptors remain the River Avon corridor, retained boundary vegetation and adjacent open areas, and these will be protected through appropriate site layout, exclusion measures and controlled construction activities.

Referenced Documents:

- Landscape and Visual Impact Assessment and Proposals (November 2025)
- Landscape Mitigation Proposals – Drawing 480/02
- Landscape Strategy & Planting Plan – Drawing 480/03
- Preliminary Ecological Appraisal

Avg. Impact Risk	Medium	Avg. Residual Risk	Low
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Activity & Environmental Aspect	Impact Risk			Project Controls and Mitigation	Residual Risk		
	L	S	R		L	S	R
Habitat impacts on vegetation providing landscaping	3	4	12	• Root Protection Areas (RPZ) to be established in accordance with BS5837 for all retained trees along the northern boundary and railway embankment • Protective fencing to be installed prior to commencement of works and maintained throughout construction • Do not tie or obstruct retained vegetation during the works, always ensure accessibility and visibility. • Employ controls as outlined in the CEMP for dust management • Consider and mitigate the setup of site and how it may obstruct landscape vegetation or contribute to new impacts such as changes to rainwater flow or winds	2	2	4
Temporary erection of hoarding	3	2	6	• No hoarding to encroach into riparian buffer or obstruct PRoW routes • Hoarding should be painted colours that will fit in with the landscape around it and must not have any bright colour logos • Hoarding / fence line must be repaired if damaged and always kept clean	2	1	2

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Temporary erection of welfare units	3	2	6	- Welfare units to be located within existing service yard area, away from northern boundary - Welfare should be positioned on the site so as to not obstruct views toward natural or scenic landscapes. It should be setup at the lowest height possible to reduce impacts on the landscape	4	1	5
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13.0 Waste and Resource Management

A Resource Management Plan (RMP) has been created to set out the waste hierarchy and how it will be implemented during construction – **document 679-TSL-ESG-RMP**.

The site is underlain by variable made ground (up to 2.6 m deep), comprising reworked soils, concrete, brick, and other demolition materials, with occasional asbestos. Beneath this, natural deposits consist of river terrace gravels and clay overlying Oxford Clay. Groundwater was recorded in some boreholes at shallow depths (as little as 1.2 m bgl), and contamination (e.g., hydrocarbons and metals) was detected in both soil and groundwater in some locations. These conditions present potential risks for construction, including variable load-bearing capacity, possible contamination, and groundwater ingress. A Remediation Strategy, including appropriate soil handling, groundwater management, and protection of construction workers, is required.

Reference Document:

- TF-25-394 GIR @ Cereal Partners (R01)

Avg. Impact Risk	High	Avg. Residual Risk	Low
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Activity & Environmental Aspect	Impact Risk			Project Controls and Mitigation	Residual Risk		
	L	S	R		L	S	R
Contaminated Land (Soil)	3	4	12	- All site personnel must maintain a watching brief during excavation for any unexpected visual evidence of contamination (e.g. discoloured soils, odours, or fragments of asbestos-containing materials) - All spills, leaks, or discharges onto soil will be treated as potentially hazardous and immediately contained pending classification by chemical testing - Plant and equipment will be subject to regular inspection and maintenance to prevent leaks of fuel, oil, or hydraulic fluids onto ground surfaces	2	2	4
Waste Generation	4	3	12	- Management of waste must be designed into the activity and must be included in RAMS and CP - TSL shall write and communicate a Resource (Waste and Materials) Management Plan (RMP). It is the responsibility of all parties on site to operate in accordance with the RMP.	2	2	4

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				- All parties generating waste are responsible for providing sustainability data on the waste to TSL for collation and reporting - Waste generated onsite will be disposed of in standard tipping skip and 40/20-yard skips, with the locations of these changing throughout the programme of works - Any domestic waste that is generated within the welfare compound, there will be wheelie bins with lids and enclosed skips for food waste. Recycling bins will also be located throughout the welfare compound			
Waste Storage	4	3	12	- Waste shall be stored in accordance with its classification and type - Waste stockpiles shall be no more than 3m in height - Regular inspections / checks must be undertaken on the waste. Waste needs to be contained, and uncontaminated. If any wastes not generated from site appear on site then investigations must be undertaken as to fly tipping - Avoidance of pollution from wastes. All wastes to be managed so that pollution of soil, water or the local environment doesn't occur. This could include but isn't limited to covering wastes, designated waste compounds, placements of wastes on impermeable surfacing. - The re-use, burial, or long-term storage of waste onsite is strictly prohibited	2	2	4
Waste Assessment & Classification	3	3	9	- Parties generating waste must be able to assess and classify the waste to ensure appropriate management - Testing results must be readily accessible for wastes on site - Asbestos, if encountered, managed in accordance with Control of Asbestos Regulations 2012	2	2	4
Waste Carriage	3	2	6	- No vehicle waiting on B3105 - Waste must be carried by a qualified / certified / licenced carrier. Checks must be complete on the third party carrying the waste prior to their acceptance of the waste - Contractors arranging for waste carriage must provide copies of authorisations and certifications to TSL for vetting and approval prior to waste leaving site - Upon arrival waste carriage transport (grabs, skip loaders etc) must be visually inspected as to suitability for transporting waste without release	2	1	2
Waste Avoidance / Reduction	3	2	6	- All parties on site must apply the principles of the waste hierarchy. Placing a preference on waste avoidance and reduction - Any decisions taken to improve the sustainability of waste management on site must be communicated to TSL so that the action can be captured and communicated through the RMP. - All waste streams shall be segregated on site. This will improve the rate of recovery, reduce costs, and even support better decisions for waste avoidance – see 679-TSL-ESG-CEMP.	2	1	2

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				- Keep all materials and resources in their packaging before use. This shall avoid waste of damaged / weathered materials and excess materials - Ensure to strip and retain topsoil and any clean soils. Retain on site for use and store as a material rather than as a waste			
Waste Treatment	2	3	6	- Physical and chemical treatment of waste is not permitted on site. This does not include acts such as segregation of waste into relevant waste streams - Offsite treatment of waste is permitted but must be undertaken with the right permissions and methodology for the waste stream being treated - Crushing of inert materials only if appropriate exemption or permit in place and client approved	1	2	2
Waste Reuse	3	3	9	- Waste generated on site is not permitted for reuse unless it can meet specific conditions for it to not be classified as a waste (for example topsoil or clean soils) - No reuse of hazardous material on site	2	2	4
Selection & Procurement of Materials	3	2	6	- Evidence (procurement information, delivery tickets) must be retained by all parties operating on site with all records aggregated by TSL - If there are procurement issues that will result in purchasing a material outside TSL's sustainability specification, then advice must first be sought after from the environmental site contact	2	2	4